



okay
E.L.
TSD

COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT
11th Floor, Monroe Building
101 N. 14th Street
Richmond, VA 23219
(804) 225-2667

MAR 1 1989

Marvin Hall
Environmental Engineer
GMC Delco Moraine Division
3401 Tidewater Trail
Fredericksburg, Virginia 22401

CERTIFIED - RETURN
RECEIPT REQUESTED

RE: Inspection Report
EPA ID # VAD091222588

Dear Mr. Hall:

During a recent (February 10, 1989) inspection, it was noted that your facility was not in total compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by a checkmark on the enclosed inspection checklists and are listed below:

1) Security

Reference Section 9.1.E.3 of VHWMR.

- a) The signs posted around the active portions of the facility state that unauthorized personnel must keep out, but do not indicate danger.

2) Contingency Plan

Reference Section 9.3 of VHWMR.

- a) Evacuation plans are posted in the plant, however, no evacuation plan for the facility has been included in the contingency plan.
- b) The documentation that the contingency plan had been sent to the local police department was missing. Mr. Hall stated that a new contingency plan would be sent to the sheriff.

- c) A description of the arrangements agreed to by the emergency response organizations and contractors listed in your contingency plan is missing. Please update your contingency plan to include this information.

3) Containers

Reference Section 9.8 of VHWMR.

- a) The Department has known that you accumulate open drums of Ajax sludge generated at the facility in the inside designated hazardous waste accumulation area (staging area) until the temperature of the drum contents drops to 110 degrees Fahrenheit (time period to be determined). The rationale behind this decision was to prevent the drums from collapsing during the cooling of the Ajax sludge from over 500 degrees Fahrenheit to ambient temperatures.

This allowance does not apply to containers in any other part of the facility or to drums used to collect the sludge which was cooled prior to being placed in the drums. Two open containers partially filled with the floor scrapings of Ajax sludge hazardous waste were found near the satellite accumulation areas. These drums were labeled as hazardous waste and were not in the process of being filled at that time.

In the future, allow only those drums which are in the designated accumulation area and which are in the process of being cooled to remain uncovered. All other drums must remain closed except as necessary to add or remove waste.

Please take the appropriate corrective action to bring your facility in total compliance with the regulations and submit a letter documenting what corrective actions have taken place by March 25, 1989. A follow-up inspection will be scheduled after this date.

At the time of the inspection it was decided to manage the "staging" area as a hazardous waste accumulation area thereby eliminating the need to remove all of the waste from the area within a three day period. The proper inspection logs have been developed and will be put into use on February 13, 1989, the next work day following the inspection.

Marvin Hall
Page 3

This letter and its attachments relate only to inspections performed under the requirements of facility interim status and do not in any way release the facility from the more stringent requirements which it must meet in order to obtain permitted status.

If you have any questions please call me at (804) 225-3019.

Sincerely,

A handwritten signature in cursive script that reads "Sharon Skutle Wilcox".

Sharon Skutle Wilcox
Environmental Engineer Senior
Division of Technical Services

Enclosures

SSW:065/lhc

January 1988

INSPECTION CHECKLIST FOR
THE USE AND MANAGEMENT OF CONTAINERS

Name of Facility: Delco-Moraine Division of GMC

Address: 3401 Tidewater Trail
Fredericksburg, VA 22401

EPA ID Number: VA D09122588

Facility Inspection Representative: Marvin Hall

Title: Environmental Engineer

Telephone Number: (703) 899-5074

Inspector's Name: Sharon Wilcox, Lisa Clark

Title: Environmental Engineer Senior

Date of Inspection: 10 February 1989

Va. Hazardous
Waste Reg.

9.8.B.

1. Are all containers in good YES NO
condition, i.e., not showing signs of
leakage or corrosion or any other
deterioration/deformation?

If not, list the storage/accumulation
areas where there are problems and the
type of problem.

Location

Problem

_____	_____
_____	_____
_____	_____
_____	_____

9.8.C.

2. Are the containers lined or made of YES NO
materials compatible with hazardous waste
placed into them so that the container
will not react or otherwise be
incompatible with (corrode, etc.) the
hazardous wastes?

9.8.D.1.

3. Are all containers holding hazardous waste kept closed during storage? YES (NO) see note ✓

If not, list the locations where open containers are found. The Department is aware of the reasons for the drums of Hot Ajax Sludge to be kept uncovered in the indoor accumulation area until the drums have cooled in order to prevent the drums from caving in. However 2 drums of partially cooled Ajax sludge were found uncovered. The material was from floor cleanings.

9.8.E.

4. Are areas where hazardous waste containers are stored inspected by the owner/operator at least once each week? YES (NO)

9.1.F.2.a.

5. For large quantity generators and TSD facilities only: YES (NO)

9.1.F.4.

6.4.E.1.d.

Is an inspection log maintained?

has form ✓
and will
start 13 Feb 1989

9.8.F.

6. Are containers holding ignitable or reactive waste located at least 50 ft. from the facility's property line? YES (NO)

9.8.G.1.

7. Are incompatible wastes placed in separate containers? YES NO NA

9.8.G.3.

8. Are storage containers holding hazardous wastes which are incompatible with nearby materials stored in containers, tanks, piles, or surface impoundments separated by dikes, berms, walls, or other devices? YES NO NA

6.4.E.4.a.

9. For satellite accumulation areas:

a. Are there more than 55 gallons of any one type of waste present in the area? YES (NO)

If yes,

6.4.E.4.b

b. Have the drums been in the satellite accumulation area longer than 3 days? YES NO NA

If yes,

6.4.E.4.b.

c. Has the company notified the Department about the location of the storage area? YES NO NA

10. Comments:

#3 The drums should have been
closed except when actually
being filled. No operators were
filling the drums in that area
at the time we were inspecting

March 4, 1988

CHECKLIST FOR THE INSPECTION
OF HAZARDOUS WASTE FACILITIES

Name of Facility: Delco-Moraine Division of GMC
Address: 34101 Tidewater Trail
Fredericksburg, VA 22401
EPA ID Number: VA D091222588
Facility Representative: Marvin Hall
Title: Environmental Engineer
Telephone Number: (703) 899-5074
Inspector's Name: Sharon Wilcox, Lisa Clark
Title: Environmental Engineer Senior
Date of Inspection: 10 February, 1989

Va. Hazardous
Waste Regulation

1. Does this facility:

Store Treat Dispose

9.1.D. 2. Does the facility have a waste YES NO
analysis plan? Does it contain:

9.1.D.5.a. → a. The parameters for which each YES NO
hazardous waste will be analyzed?

9.1.D.5.b. → b. The test methods for each YES NO
parameter?

9.1.D.5.c. → c. The sampling method to obtain a YES NO
representative sample?

9.1.D.5.d. → d. The frequency to review the YES NO
analysis?

9.1.D.6. For off-site facilities only:

e. The procedures used to inspect, and YES NO N/A
if necessary, analyze each shipment of
hazardous waste received at the facility?

9.1.E. 3. Does the facility have either

9.1.E.2.a. a. a 24-hour surveillance system? YES NO

OR

9.1.E.2.b. b. A natural or artificial barrier YES NO
which completely surrounds the active
portion of the facility? AND,

9.1.E.2.c. c. A means to control entry at all YES NO
times to the active portion of the
facility?

9.1.E.3. 4. Is a sign posted at each entrance and YES NO
at locations in sufficient numbers to be
seen from all approaches to the active
portion of the facility stating "Danger-
Unauthorized Personnel Keep Out"?

danger not
on sign ✓

9.1.F.2. 5. Does the facility have a written YES NO
inspection schedule for all monitoring
equipment, safety and emergency
equipment, security devices, and
operating and structural equipment?

Does the inspection schedule include:

9.1.F.2.c. a. The types of problems to look for YES NO
during the inspection?

9.1.F.2.d. b. The frequency of inspection? YES NO

9.1.F.4. → 6. Does the owner/operator maintain an YES NO
inspection log or summary of all
inspections?

9.1.G.1.a. 7. Have facility personnel successfully YES NO
completed a program of on the job and
classroom instruction in proper hazardous
waste management?

9.1.G.2. 8. Are new personnel trained within six YES NO
months after assignment to the facility?

9.1.G.3. 9. Are facility personnel given annual YES NO
reviews of the initial training?

an
inventory log has been
maintained for
the storage area
The facility just
designated the
staging area as
an accumulation
area not a
satellite area
Therefore they
must now inspect
the staging area

- 9.1.G.4. 10. Are the following documents and records maintained at the facility?
- 9.1.G.4.a. a. Job titles for each position ☒ YES NO related to hazardous waste management?
- b. The name of the employee filling ☒ YES NO each job?
- 9.1.G.4.b. c. A written job description for each ☒ YES NO position?
- 9.1.G.4.c. d. Records to document the amount of ☒ YES NO introductory and continuing training given each facility personnel?
- 9.2.B. 11. Is the facility equipped with the following:
- 9.2.B.1. a. An internal communications or alarm ☒ YES NO system capable of providing immediate emergency instruction to facility personnel?
- 9.2.B.2. b. A device (telephone, 2 way radio) ☒ YES NO capable of summoning emergency assistance?
- 9.2.B.3. c. Portable fire extinguishers, fire ☒ YES NO control equipment, and decontamination equipment?
- 9.2.B.4. d. Water at adequate volume and ☒ YES NO pressure to supply expected fire demands, foam producing equipment, automatic sprinklers, or water spray systems?
- 9.2.E. 12. Is adequate aisle space maintained ☒ YES NO to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area during an emergency?
- 9.3. 13. Does the facility have a contingency plan that deals with the following?
- 9.3.B.1. a. Actions that facility personnel ☒ YES NO will take in response to fires, explosions, or unplanned releases of hazardous waste?

9.3.B.3.

b. The arrangements agreed to by local police and fire departments, hospitals, contractors, and Commonwealth and local emergency response teams?

YES ☒ NO

9.3.B.4.

c. The name, addresses, and office and home phone of all emergency coordinators?

YES ☒ NO

List the primary coordinator

Name Marvin Hall

Office Telephone 703-899-5074

Home Telephone (b) (6)

9.3.B.5.

d. A list of all emergency equipment, the location and physical description of the item, and a brief outline of its capabilities?

YES ☒ NO

9.3.B.6.

e. An evacuation plan if necessary?

YES ☒ NO

9.3.C.2.

14. Has a copy of plan been sent to all local police and fire departments, hospitals, and Commonwealth and local emergency response teams that may be called to provide emergency services?

YES ☒ NO

The evacuation diagram is posted in locations inside the plant but is not included in the Contingency Plan

List them Spotsylvania Fire Dept

Fredericksburg Fire Dept

Spotsylvania Rescue Squad

Fredericksburg Rescue Squad

Mary Washington Hospital

Is there documentation that the above agencies have received the contingency plan?

YES ☒ NO

9.3.D.

Has the plan been implemented?

YES ☒ NO

If yes,

9.3.F.9.

a. Did the owner notify the Executive Director prior to resuming operations?

YES ☒ NO

N/A

9.3.F.10.

b. Did the owner file a written report within 15 days with the Executive Director?

YES ☒ NO

N/A

9.4.B.1.

15. Does the facility have a written ☒ YES ☐ NO
operating record? Does the record
include:

9.4.B.2.a.

a. A description of the quantity of ☒ YES ☐ NO inventory log
hazardous waste received, and the
method(s) and date(s) of its treatment,
storage, or disposal?

9.4.B.2.b.

b. The location of each hazardous ☒ YES ☐ NO
waste within the facility?

9.4.B.2.c.

c. The results of waste analysis and ☒ YES ☐ NO
incineration trial tests?

9.4.D.

16. Has the facility submitted an annual ☒ YES ☐ NO
report for the previous calendar year?

9.4.E.

17. Has the facility accepted any ☒ YES ☐ NO
unmanifested waste shipments?

18. Comments

January 1988

CHECKLIST FOR HAZARDOUS WASTE
INSPECTION OF GENERATORS

Name of Facility: Delco-Moraine
Address: 3401 Tidewater Trail
Fredericksburg, VA 22401
EPA ID Number: VA D09122588
Facility Representative: Marvin Hall
Title: Environmental Engineer
Telephone Number (703) 849-5074
Inspector's Name: Sharon Wilcox, Lisa Clark
Title: Environmental Engineer Senior
Date of Inspection: 10 February, 1989

Va. Hazardous Generator Checklist
Waste Reg.

- 6.3. 1. Is a manifest system currently being ☒ YES ☐ NO
used for all hazardous waste shipped off
site?
- 6.2.C. 2. Has the generator determined that the ☒ YES ☐ NO
transporter(s) and facility have an EPA
ID number? [Note: Shipments to POTWs
must be manifested.]
- 5.5.A.7 3. Has the generator determined that the ☒ YES ☐ NO
transporter has a valid Virginia
Transporter Permit?
- 6.3 4. Is the following information on the
5.3.B.1. manifest:
- a. The generator's name, mailing ☒ YES ☐ NO
address, EPA ID Number, and
telephone number?
- 5.3.B.2. b. An unique five digit number ☒ YES ☐ NO
assigned to this manifest by the
generator?

- 5.3.B.3. c. The total number of pages of the manifest? ☒ YES NO
- 5.3.B.4. d. The company name and EPA ID number of transporter used? ☒ YES NO
- 5.3.B.5. e. The company name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES NO
- 5.3.B.6. f. The U. S. DOT description of each waste to include its proper shipping name, hazard class, and I.D. number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Material? ☒ YES NO
- 5.3.B.7. g. The quantities of waste being shipped? ☒ YES NO
- 5.3.C. h. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by (mode of transportation) according to applicable international and national governmental regulations. I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment." ☒ YES NO
- 6.5.C.2. 5. Have manifest been received from the TSD facility for any waste which was shipped over 45 days ago? ☒ YES NO

If no, has the generator filed an exception report with the Executive Director which included:

- 6.5.C.2.a. a. A legible copy of the manifest for which the generator does not have confirmation of the delivery? YES NO N/A
- 6.5.C.2.b. b. A cover letter explaining the efforts taken to locate the shipment? YES NO N/A
- 6.4.E.1. 6. Is hazardous waste being accumulated on-site for less than 90 days? If yes, YES NO Outside Storage > 90 days
- 6.4.E.1.a. a. Is the waste stored in Satellite accum - I.S. Storage Area containers or tanks? (If yes, fill out appropriate checklists. If no, a TSD permit is required.) YES NO (accumulation)
- 6.4.E.1.b. b. Is the date that accumulation begins clearly marked and visible for inspection on each container? YES NO
- 6.4.E.1.c. c. Is each container and tank clearly marked with the words "Hazardous Waste"? YES NO
- 6.4.E.1.e. d. Has the generator notified the Executive Director by March 1, 1988, of the exact location of the accumulation areas? YES NO
- 6.4.E.1.d. 7. Does the generator record inspections in an inspection log? YES NO See #3 and comments on container checklist
- 9.1.F.4. 8. Have facility personnel successfully completed a program of classroom training or on-the-job training in hazardous waste management procedures? YES NO
- 6.4.E.1.d. 9.1.G.1. 9. Have new employees to the facility successfully completed training mentioned above within 6 months of their employment or assignment to the facility? YES NO N/A No new employees in H.W.M.
- 9.1.G.2. 10. Do personnel participate in an annual review of the initial training? YES NO
- 9.1.G.3. 11. Does the facility maintain a record of:
- 9.1.G.4.a.

- a. job titles for personnel that are involved with hazardous waste management; and ☒ YES NO
- b. the name of the employee filling each job? ☒ YES NO
- 9.1.G.4.b. 12. Does the facility have on record a written position description for each job title noted in Question #10? ☒ YES NO
- 9.1.G.4.c. 13. Does the facility maintain a written description of the type and amount of introductory and continuing training for those employees involved in hazardous waste management? ☒ YES NO
- 9.1.G.4.d. 14. Does the facility have records to document this training? ☒ YES NO
- 9.2.B. 15. At the facility, is the following equipment installed:
- 9.2.D. .
- 9.2.B.1. a. An internal communications or alarm system capable of providing immediate emergency instructions to facility personnel if the hazardous waste storage area is threatened by fire or explosion? ☒ YES NO
- 9.2.B.2. b. A device at the scene of hazardous waste generator operations capable of summoning emergency assistance from Police, Fire Departments, etc.? ☒ YES NO
- 9.2.B.3. c. Portable fire extinguishers, fire control, spill control, and decontamination equipment?; and ☒ YES NO
- 9.2.B.4. d. Water at adequate volume and pressure to supply expected fire demands, foam producing equipment, automatic sprinklers or water spray system? ☒ YES NO
- 9.2.C. 16. Is a record of tests and inspections of required equipment (question 15) maintained at the facility? ☒ YES NO
- 9.2.E. 17. Does the facility have adequate aisle space to allow the unobstructed movement of personnel and equipment during emergencies? ☒ YES NO


- 6.4.E.1.d.
9.3.
18. Does the facility have an established contingency plan to deal with any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to the air, soil, ground water or surface water? ☒ YES NO
- 9.3.B.
19. Does the contingency plan contain the following elements:
- 9.3.B.(1,2).
- a. A detailed description of emergency procedures facility personnel will implement in response to fires, explosions, or unplanned releases of hazardous waste to air, soil, and water? ☒ YES NO
- 9.3.B.4.
- b. A listing of names, addresses, and phone numbers of the generator facility emergency response coordinators? List primary Coordinator. ☒ YES NO
- Name Marvin Hall
- Title Environmental Engineer
- Telephone ██████████ (b) (6) ██████████
- 9.3.B.5.
- c. A list of appropriate emergency equipment necessary to cope with emergencies at the generator facility? ☒ YES NO
- 9.3.B.6.
- d. Does this list specify the location and physical description of each item on the list and a brief description of each item on the list, and a brief outline of its capabilities? ☒ YES NO
- 9.3.B.6.
- e. An evacuation plan for the generator facility where there is a possibility that evacuation could be necessary? ☒ YES NO

9.3.C.

f. Have copies of the contingency plan been sent to all local police departments, fire departments, hospitals and Commonwealth and local emergency response teams? List: ☒ YES ☐ NO

revised copy to sheriff
see Facility checklist

9.3.C.

g. Is there documentation to indicate the personnel listed above received the contingency plan? ☒ YES ☐ NO  except for sheriff

9.3.F.(9,10).

h. If the contingency plan has been implemented, was a written report filed with the Executive Director and were the Executive Director and other required authorities properly notified before operations resumed? YES ☐ NO ☒ N/A

6.4.E.4.a.

20. Does the generator have satellite accumulation areas? If yes, ☒ YES ☐ NO

a. Is the area located at or near the point of hazardous waste generation? ☒ YES ☐ NO


6.4.E.4.a.(1)
9.8.B.

b. Are the containers in good condition? ☒ YES ☐ NO

6.4.E.4.a.(1)
9.8.C.


c. Are the containers compatible with the waste? ☒ YES ☐ NO

6.4.E.4.a.(1)
9.8.D.1.

d. Are the containers kept closed? YES ☒ NO 

6.4.E.4.a.(2)

e. Are the containers marked with the words "Hazardous Waste" or other words that identify the contents of the container? ☒ YES ☐ NO

see #3  comments on container checklist

6.5.E.4.b.

f. Are amounts in excess of those allowed being accumulated in the satellite accumulation area? If yes, YES ☒ NO ☐

(1) Has the generator marked the amount in excess with the date the excess amount began accumulating? YES ☐ NO ☒ N/A

(2) Has the generator either YES NO *N/A*
removed the excess amount
within three days of the date
of excess accumulations or has
he complied with all other
provisions for accumulation
areas listed in question 5 on
this checklist? Namely, has he
notified the Executive Director
about the location of the
accumulation area?

What has the generator chosen
to do? _____

6.5.A.

21. Does the generator retain copies of ☒ YES NO
all manifests, annual reports, and test
results for at least three years?

6.5.B.

22. Has the facility submitted an annual ☒ YES NO
report for the preceding calendar year?

23. Comments

January 1988

SURVEY SHEET
FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

Name of Facility: Delco Moraine Division GMC

Address: 3401 Tidewater Trail

Fredericksburg, VA 22401

EPA ID Number: VAD09122588

Facility Representative: Marvin Hall

Title: Environmental Engineer

Telephone Number: (703) 899-5074

Inspector's Name: Sharon Wilcox, Lisa Clark

Title: Environmental Engineer Senior

Date of Inspection: 10 February, 1989

1. What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) Manufacture

torgue converter clutches

2. Give a brief description of the waste stream(s) and hazardous waste code(s). D001 - Ajax Sludge

may be D001/D007 due to chromium

3. List the amounts of hazardous waste generated on a monthly basis (use the highest monthly total) and the greatest amount accumulated at the site.

Waste Code	Amount Generated	Amount Accumulated
<u>D001/D007</u>	<u>15,000 #/mo</u>	<u>69 drums in storage</u>
<u></u>	<u>900 #/drum</u>	<u>3 drums in accumulation area</u>
<u></u>	<u></u>	<u>1 drum in aisle</u>
<u></u>	<u></u>	<u>4 drums in each satellite accumulation area</u>

4. Does the facility ever generate greater than:
-1 kg. of acutely toxic waste (P listed waste or YES ☒ NO
F020-F023 and F026-F027)?

-100 kg of clean up from a spill of P listed waste YES ☒ NO
or F020-F023 and F026-F027 waste?

If yes, then the facility is a generator.

5. Does the facility generate land banned waste? (YES ☒ NO)

If yes, circle the type:

F001 F002 F003 F004 F005

California List - list the metal

Cyanide

Dioxin

How is the waste presently being handled? Where is it sent?
Is the generator providing the required certifications to
the TSD facility?

EnviroSafe Services of OHIO OH DO 45243706 disposal
transporter's disposal (hand filled) YES

6. Does the facility generate any hazardous waste that is
excluded from regulation? If yes, list the waste and the basis
for exclusion.

NO

7. Based on the above, the facility is a:

- a. conditionally exempt small quantity generator
- b. small quantity generator
- ☒ c. generator

8. Check accumulation times for the three types of generators.

If the times are exceeded, then the facility is moved up to the next category.

A conditionally exempt small quantity generator can accumulate indefinitely, but if the amount accumulated ever exceeds 1000 kgs. then he becomes a small quantity generator. At the time the 1000 kg. limit is passed, the accumulation times for small quantity generators begins.

Small quantity generators can accumulate up to 180 days or 270 days if the disposal site is over 200 miles away. However, if at any time over 6000 kgs. of waste is accumulated, then the small quantity generator becomes a generator.

9. List each container and tank accumulation area. Specify the number and capacity of each tank. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of waste (or one quart of acutely toxic waste) is at that site.]

Location	Number of Containers	Number of Tanks	Capacity
<u>Storage</u>	<u>69</u>	<u> </u>	<u>136 drums</u>
<u>accumulation</u>	<u>3</u>	<u> </u>	<u>25 drums</u>
<u>satellite</u>	<u>4 leach</u>	<u> </u>	<u>21 drums</u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>
<u> </u>	<u> </u>	<u> </u>	<u> </u>

10. Comments

11. Waste Management Flow Diagram

(On this page sketch a brief flow diagram that includes where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste.)

